

c. Remarks

I. The Rejection

Claims 1 – 15, all claims in this application, have been rejected under 35 U.S.C. § 102 (e) as unpatentable over Park (US 5,675,424) “for the same reasons as set forth in previous Office Action (Paper no. 7, dated Nov. 18, 2002)”.

In that Office Action, the Examiner acknowledged that an error was made in the preceding Office Action in that “demultiplexer 13 of fig. 3a described by Park ‘424 does not derive multiple data-streams from a single data-stream”. In addition, the Examiner changed position in the rejection to rely on fig. 3b and element 61 instead of fig. 3a and 13. The Examiner also relied on “the combination of (i.e. figs. 3a – 3b, units 13 and 61)” as serving “the same as the interleaving network as claimed”.

In addition, in the current Office Action in this Continuing Patent Application (CPA), the Examiner further stated that the previously “new added limitation, ‘coupling network comprises interleaving means responsive to the datastream of MPEG...’ reads on fig. 3a-3b....”.

The Examiner continues “Reduced image Data is an MPEG encoded Data stream, and Multiplexer (interleave) and De-Multiplexer (De-interleave) is considered as an coupling network for interleaving/de-interleaving the data-streams 12a-12n, in which data stream 12a is considered as first and second or third and fourth or etc. and also 12b is considered as third and fourth, and further to 12n as 1st and nth and etc.”.

In order to address these issues directly, Applicant has elected to rearrange the claim language to overcome some of the confusion which arose from difficulties in understanding the inartfully translated English language appearing in the Park patent.

2. The Combinations of Elements in Each of the Claims is Not Disclosed By Park

It should be noted at the outset that all of the present claims are directed to combinations of structural elements (claims 1 – 6) or to combinations of method steps (claims 7 – 15). Under 35 U.S.C. § 102 (e), in order to anticipate a claim, the reference must disclose each and every element of the claim and in that claimed combination. That is,

“A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.” *Verdegaal Bros. V. Union Oil Co. of California*, 814 F2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

“The identical invention must be shown in as complete detail as is contained in the ----claim.” *Richardson v. Suzuki Motor Co.*, 868 F2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

“The elements must be arranged as required by the claim, but ----identity of terminology is not required.” *In re Bond*, 910 F2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

It is noted that the Examiner has acknowledged that Park’s invention itself does not anticipate the present invention.

The combination of elements recited in independent apparatus claim 1 includes a “ first datastream being constituted by a first predetermined sequence of interleaved first and second spatially adjacent pixel block components” . Claim 1 further recites a “ second datastream being constituted by a second predetermined sequence of interleaved third and fourth spatially adjacent pixel block components”. These recited first and second datastreams are further specified as being “selectable for producing either high resolution or reduced data image reproduction of a complete image”.

This combination of elements is clearly not disclosed in and is nowhere suggested by Park.

The Examiner’s characterization of what Park discloses which is quoted on the preceding page above (see ““Reduced image Data is an MPEG

encoded Data stream, and Multiplexer (interleave) and De-Multiplexer (De-interleave, etc.) does not satisfy the requirements of the Patent Law as quoted above.

According to Park, "one frame image is divided into n subpictures P1 through Pn" (col. 1, line 48) and "encoders 12a through 12n (are) for processing one by one image data on respective subpictures P1 through Pn" (col. 1, line 63). Thus, each "subpicture" contains all of the pixel components for that vertical segment of the image and there is no separation of pixel components into the first and second predetermined sequences of pixel block components as required by the language of claim 1. In addition, there is clearly no mention in Park of any such two datastreams which are "selectable for producing either high resolution or reduced data image reproduction of a complete image" as is required by claim 1.

Claims 3 and 4 each have been amended to point out further characteristics of the pixel block components in each of the separated datastreams which are not mentioned at all in connection with the cited figures of Park.

In independent method claim 7, it is pointed out that the recited multiple datastreams, each having a different predetermined sequence of mutually interleaved pixel block components, are selectable for either high resolution or reduced resolution data image reproduction modes for a complete image. Nothing of this nature is disclosed or suggested by Park.

Independent method claim 13 has been rearranged in a manner similar to claim 7 so as to describe the first and second data streams each as comprising different interleaved groups in different predetermined sequences which are selectable for reproducing complete images in either high resolution or reduced resolution image reproduction modes. Here again, such a combination is neither suggested nor disclosed by Park.

The combinations of elements in Park relied upon by the Examiner are for entirely different purposes and are entirely different arrangements as compared to what is presently claimed

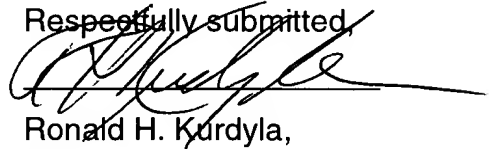
The rejected dependent claims are submitted to be patentable because each includes limitations which are recited in independent claims 1, 7 and 13 which are submitted to be patentable over Park.

Reconsideration and withdrawal of all rejections are respectfully requested in view of the amendments to the claims and the arguments presented above.

CONCLUSION

The identical invention is not shown in Park in as complete detail as is contained in any of Applicant's claims (see Richardson v. Suzuki Motor Co., supra) and, furthermore, the elements arranged as required by the claims are not disclosed in Park (see In re Bond, supra). In view of the foregoing, reconsideration and withdrawal of all of the rejections and allowance of all pending claims 1 -15 are respectfully requested.

Respectfully submitted,



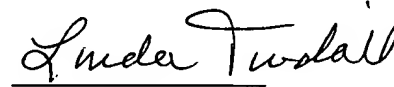
Ronald H. Kurdyla,
Attorney
Registration No. 26,932
609/734 - 6818

Patent Operations
Thomson Licensing Inc.
P.O. Box 5312, 2 Independence Way
Princeton, New Jersey 08543
July 3, 2003

CERTIFICATE OF MAILING

I hereby certify that this amendment is being deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to the Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450 on:

July 3, 2003
Date


Linda Tindall